

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

**DIVERSE MEDICAL
MANAGEMENT, INC., and AZZAM
MEDICAL SERVICES, LLC,**

Plaintiffs,

v.

**PLATINUM GROUP USA, INC.,
AMER RUSTOM, MICHAEL LEWITT,
AMERICORE HEALTH, LLC,
GRANT WHITE, and JAMES B. BIDEN,**

Defendants.

PLATINUM GROUP USA, INC.,

Counterclaim Plaintiff,

v.

**DIVERSE MEDICAL MANAGEMENT,
INC., MICHAEL FREY, NATALIE
FREY, AND MOHANNAD AZZAM,**

Counterclaim Defendants.

**AMERICORE HEALTH, and GRANT
WHITE**

Counterclaim Plaintiffs,

v.

**DIVERSE MEDICAL MANAGEMENT,
INC., and MICHAEL FREY**

Counterclaim Defendants.

**Case No: 19-CV-00046
JURY DEMAND**

**Judge Collier
Magistrate Judge Steger**

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) and/or Rule 21 of the Federal Rules of Civil Procedure, and a mutual confidential agreement and release, parties Diverse Medical Management, Inc.; Azzam Medical Services, LLC; Michael Frey; Natalie Frey; Mohannad Azzam; Platinum Group USA, Inc.; Amer Rustom; Michael E. Lewitt; and James B. Biden¹ hereby jointly stipulate to the dismissal, with prejudice, of this lawsuit with all parties paying their own attorneys' fees, costs, and expenses.

Respectfully submitted,

/s/ Robert A. Peal

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Inc., Azzam Medical Services, LLC, Michael
Frey, Natalie Frey, and Mohannad Azzam*

/s/ David R. Smith

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¹ Defendant Americore Health, LLC is currently in Chapter 11 Bankruptcy in the United States Bankruptcy Court for the Eastern District of Kentucky and, accordingly, cannot take any action in this action while the bankruptcy stay is in place. When the stay is lifted, the parties intend to stipulate to a full dismissal with prejudice of all claims involving Americore Health, LLC, as well.

*Counsel for Platinum Group USA, Inc., Amer
Rustom, Michael Lewitt, and James B. Biden*

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2020, a true and exact copy of the foregoing was served on the following via email and/or the Court's CM/ECF system:

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